

APPENDIX B

KK EXHIBITS 1 to 102

IOS IMESSAGE/SMS/MMS

CHAT PARTICIPANTS	
Number of participants	9
Display names	<div style="display: flex; justify-content: space-between; align-items: center;"><div style="flex: 1; text-align: right;">7704</div><div style="flex: 1; text-align: right;">0565</div><div style="flex: 1; text-align: right;">0803</div><div style="flex: 1; text-align: right;">5292</div><div style="flex: 1; text-align: right;">Duke Maloney</div><div style="flex: 1; text-align: right;">Redacted</div><div style="flex: 1; text-align: right;">John Fawcett</div><div style="flex: 1; text-align: right;">Redacted</div><div style="flex: 1; text-align: right;">Local User</div><div style="flex: 1; text-align: right;">Megan Benett</div><div style="flex: 1; text-align: right;">Redacted</div><div style="flex: 1; text-align: right;">Steven R. Pounian</div><div style="flex: 1; text-align: right;">Redacted</div></div>
Local user	
CONVERSATION DETAILS	
Number of messages	316
First message sent date/time	8/31/2020 4:34:49 PM
Last message sent date/time	7/15/2021 7:05:06 PM
Case time zone	(UTC) Coordinated Universal Time

Duke Maloney **Redacted**

↔ Unknown direction

7/15/2021 6:47:58 PM

Can we have a call this afternoon to discuss Yahoo?
3:15 or 3:30?

From: John Hartney <JHartney@kreindler.com>
Sent: Wednesday, July 21, 2021 4:11 PM EDT
To: Andrew J. Maloney <AMaloney@kreindler.com>
Subject: Re: Jarrah Search

Will call you in 20 min

Sent via the Samsung Galaxy S21 Ultra 5G, an AT&T 5G smartphone
Get [Outlook for Android](#)

From: Andrew J. Maloney <AMaloney@kreindler.com>
Sent: Wednesday, July 21, 2021 3:49:01 PM
To: John Hartney <JHartney@kreindler.com>
Subject: RE: Jarrah Search

Just tried calling you. Call my cell Redacted

From: John Hartney <JHartney@kreindler.com>
Sent: Wednesday, July 21, 2021 3:38 PM
To: Andrew J. Maloney <AMaloney@kreindler.com>
Subject: Re: Jarrah Search

I performed the search on Lisa, Deb, Jim, john, steve and your email accounts i did get a good number of results. Do you plan on coming into the office so we can go over it?

or discuss on phone

I did not see any emails going out of anyone email box with that particular transcript.

John Hartney
LAN Administrator

Kreindler & Kreindler LLP

485 Lexington Ave
New York, NY 10017

T: 212.973.3491 · E-mail: jhartney@kreindler.com
F: 212.972.9432 · Web: www.kreindler.com

 Please consider the environment before printing this e-mail.

From: Andrew J. Maloney <AMaloney@kreindler.com>
Sent: Wednesday, July 21, 2021 3:10 PM
To: John Hartney <JHartney@kreindler.com>
Subject: Jarrah Search

Any questions?

From: Andrew J. Maoney <AMaoney@krendler.com>

Sent: Wednesday, July 21, 2021 5:14 PM EDT

To: Jim Krendler <JKrendler@krendler.com>; Steven R. Pounan <Spounan@krendler.com>; Megan Bennett <Mbenett@krendler.com>

Subject: Jarrah

I asked John Hartney to search the outgoing email boxes of the KK 9/11 team since we received the Jarrah depo transcript on June 28 to see if anyone sent the Jarrah transcript to anyone outside the firm. He looked at Jim, Duke, Steve, John, Megan, Julia, Debbie, Lisa and Izabela. He found no evidence that the transcript was sent to anyone outside the firm.

I asked him to also look for any emails to Mike Isikoff in the last month and he will finish that separate search tomorrow. I told him we may be asked to have him sign an affidavit some day but not at this time.

Sent from my iPhone

IOS IMESSAGE/SMS/MMS

CHAT PARTICIPANTS	
Number of participants	3
Display names	+ [REDACTED] 5963 John Hartney Redacted Local User
Local user	
CONVERSATION DETAILS	
Number of messages	332
First message sent date/time	11/17/2020 12:26:49 AM
Last message sent date/time	7/28/2021 11:30:30 PM
Case time zone	(UTC) Coordinated Universal Time

Local User <Andrew Maloney iPhone-Decrypted>

↔ Unknown direction

7/22/2021 1:34:11 AM

As anticipated, the Saudis tomorrow at 3:00 will make a motion in court to investigate the Isikoff - Jarrah leak. Please finish your second search on Isikoff ASAP and let me know tomorrow before noon if possible.

IOS IMESSAGE/SMS/MMS

CHAT PARTICIPANTS	
Number of participants	3
Display names	[REDACTED] 5963
	John Hartney [REDACTED]
	Local User
Local user	
CONVERSATION DETAILS	
Number of messages	332
First message sent date/time	11/17/2020 12:26:49 AM
Last message sent date/time	7/28/2021 11:30:30 PM
Case time zone	(UTC) Coordinated Universal Time

John Hartney [REDACTED] ⇔ Unknown direction
7/22/2021 10:54:45 AM

Perform search on isikoff name and email address and found noone sent him the transcript there is email communication with Jim discussing lifting of gag order and isikoff writing an article

From: John Hartney <JHartney@krendler.com>
Sent: Thursday, July 22, 2021 10:32 AM EDT
To: Andrew J. Maoney <AMaoney@krendler.com>
Subject: FW: [E] Re: checking in

From: Jim Krendler
Sent: Tuesday, July 13, 2021 1:26 PM
To: Michael Iskoff <mskoff@verizonmeda.com>
Subject: Re: [E] Re: checking in

Will do

Sent from my Phone

On July 13, 2021, at 1:25 PM, Michael Iskoff <mskoff@verizonmeda.com> wrote:

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you are expecting them or know the sender and know the content is safe.

Ok, a message to write something for Thursday or Friday -- so if any update by then, let me know.

On Tuesday, July 13, 2021 at 12:31 PM Jim Krendler <JKrendler@krendler.com> wrote:

Still working on motion. Too many chefs....

Sent from my Phone

On July 13, 2021, at 11:53 AM, Michael Iskoff <mskoff@verizonmeda.com> wrote:

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you are expecting them or know the sender and know the content is safe.

Hi Jim-- where do you stand on your request to DOJ to lift the state secrets privilege and gag order? Am planning on writing something this week.

Mike Iskoff
c 202-258-2535

From: AMa oney@kredner.com <AMa oney@kredner.com>
Sent: Thursday, July 22, 2021 10:35 AM EDT
To: John Hartney <JHartney@kredner.com>
Subject: Re: Thurs. July 1st 2:30pm - Iskoff - Conspiracy and Interview

Thank you. Is that a there s?

Sent from my Phone

On July 22, 2021, at 10:33 AM, John Hartney <JHartney@kredner.com> wrote:

From: Jm Krener
Sent: Monday, June 28, 2021 2:34 PM
To: Mark Seman <mark@yahoonews.com>
Cc: Mchael Iskoff <mskoff@verizonmedial.com>
Subject: Re: Thurs. July 1st 2:30pm - Iskoff - Conspiracy and Interview

Thanks

Sent from my Phone

On Jun 28, 2021, at 2:28 PM, Mark Seman <mark@yahoonews.com> wrote:

CAUTION: This email or message originated from outside of the organization. Do not click links or open attachments unless you are expecting them or know the sender and know the content is safe.

Jm,

I hope you are well.
Mark here - Michael Iskoff's producer.

Here's the Zoom Invite info for this Thursday at 2:30pm

Mark Seman is inviting you to a scheduled Zoom meeting.

Topic: Iskoff w/ Jm Krener & A Soufan
Time: July 1, 2021 02:30 PM Eastern Time (US and Canada)

Join Zoom Meeting

<https://us02web.zoom.us/j/89967891280?pwd=OWtVZDRvZGduUVROC9UeUt0OVVsZz09>

Meeting ID: 899 6789 1280
Passcode: 420714
One tap mobile
+16465588656,,89967891280#,,,*420714# US (New York)
+13017158592,,89967891280#,,,*420714# US (Washington DC)

Or dial by your location

+1 646 558 8656 US (New York)
+1 301 715 8592 US (Washington DC)
+1 312 626 6799 US (Chicago)
+1 669 900 9128 US (San Jose)
+1 253 215 8782 US (Tacoma)
+1 346 248 7799 US (Houston)

Meeting ID: 899 6789 1280

Passcode: 420714

Find your local number: <https://us02web.zoom.us/u/kctag2jRM0>

--

Mark Seman
Head of Audio / Podcasts
Yahoo News
917.723.4639

From: Andrew J. Maloney <AMaloney@kreindler.com>
Sent: Thursday, July 29, 2021 1:03 PM EDT
To: John Hartney <JHartney@kreindler.com>
Subject: RE: People with access to Musaed al Jarrah folder

Thanks – but based on your excel spread sheet, it does not appear that anyone downloaded Jarrah

From: John Hartney <JHartney@kreindler.com>
Sent: Thursday, July 29, 2021 12:32 PM
To: Andrew J. Maloney <AMaloney@kreindler.com>
Subject: People with access to Musaed al Jarrah folder

ShareFile - Where Companies Connect x G sharefile how can i tell who accessed this x New Tab x | New Tab x | +

kreindler.sharefile.com/home/shared/fo79d39d-38f0-4b21-ae58-1cbe7ef8d7ed

Apps Sign in to Outlook Litify Login Litify Learning Hub Brivo Administration Con... Kreindler COVID for... Transit Check EVM Admin Login vSphere - Nutanix... Nutanix Web Conso...

KREINDLER LLP

Dashboard

Folders

- Personal Folders
- Shared Folders
- Favorites

File Box

Recycle Bin

Inbox

People

Settings

Search folder users

Clone User Notify Users Remove Selected Add People to Folder

	Name	View	Download	Download Alerts	Upload	Upload Alerts	Delete	Admin
<input type="checkbox"/>	JS Slenski, Julia (Kreindler & Kreindler) (owner)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	Super Users	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	MB Benett, Megan (Kreindler)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	LD Dunham, Larry	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	JF Fawcett, John (Kreindler & Kreindler)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	AM Maloney, Andrew (Kreindler)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	CM Martinez, Carolyn (Baumeister)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	EN Nakleh, Emile	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	DP Pagan, Debra (Kreindler)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	SP Pounian, Steve (Kreindler)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	GS Schroen, Gary	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Redacted	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	RS Sheps, Robert (Sheps Law Group)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	GS Simpson, Gavin (Kreindler & Kreindler LLP)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Redacted	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Redacted	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Redacted	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Apply permissions to subfolders							

Type here to search

76°F Mostly cloudy

From: Steven R. Pounian <Spounian@kreindler.com>
Sent: Thursday, August 12, 2021 6:26 PM EDT
To: Steven R. Pounian <Spounian@kreindler.com>
Subject: FW: Search for Jarrah Transcript being sent

From: Andrew J. Maloney <AMaloney@kreindler.com>
Sent: Thursday, July 29, 2021 3:53 PM
To: Jim Kreindler <JKreindler@kreindler.com>; Steven R. Pounian <Spounian@kreindler.com>; Megan Bennett <Mbenett@kreindler.com>; John Fawcett <Jfawcett@kreindler.com>; Debra Pagan <dpagan@kreindler.com>
Subject: Fwd: Search for Jarrah Transcript being sent

Sent from my iPhone

Begin forwarded message:

From: John Hartney <JHartney@kreindler.com>
Date: July 29, 2021 at 3:40:37 PM EDT
To: "Andrew J. Maloney" <amaloney@kreindler.com>
Subject: Search for Jarrah Transcript being sent

Performed two searches on mailboxes one search on the last name Jarrah and one with the filename of the deposition that was send to us by Golkow reporting mj061721

The results are as follows

Andrew Maloney – Send to John Hartney

Debra Pagan – Send to Carolyn Martinez cmartinez@baummiesterlaw.com
John Fawcett
Julia Sienski

John Fawcett – Redacted

Jim Kreindler – No one

Julia Sienski – No one

Lisa Ranieri – Megan Benett

Megan Benett – No one

Steven Pounian – No one

Keep in mind text in attachments are not searchable with the Ediscovery tool in Microsoft exchange

From: Steven R. Pounian <Spounian@kreindler.com>
Sent: Thursday, August 12, 2021 6:36 PM EDT
To: Megan Bennett <Mbenett@kreindler.com>
Subject: FW: Search for Jarrah Transcript being sent

Here is email from Hartney about his searches..

Redacted

From: Andrew J. Maloney <AMaloney@kreindler.com>
Sent: Thursday, July 29, 2021 3:53 PM
To: Jim Kreindler <JKreindler@kreindler.com>; Steven R. Pounian <Spounian@kreindler.com>; Megan Bennett <Mbenett@kreindler.com>; John Fawcett <Jfawcett@kreindler.com>; Debra Pagan <dpagan@kreindler.com>
Subject: Fwd: Search for Jarrah Transcript being sent

Sent from my iPhone

Begin forwarded message:

From: John Hartney <JHartney@kreindler.com>
Date: July 29, 2021 at 3:40:37 PM EDT
To: "Andrew J. Maloney" <amaloney@kreindler.com>
Subject: Search for Jarrah Transcript being sent

Performed two searches on mailboxes one search on the last name Jarrah and one with the filename of the deposition that was send to us by Golkow reporting mj061721

The results are as follows

Andrew Maloney – Send to John Hartney

Debra Pagan – Send to Carolyn Martinez cmartinez@baummiesterlaw.com
John Fawcett
Julia Sienski

John Fawcett – Redacted

Jim Kreindler – No one

Julia Sienski – No one

Lisa Ranieri – Megan Benett

Megan Benett – No one

Steven Pounian – No one

Keep in mind text in attachments are not searchable with the Ediscovery tool in Microsoft exchange

From: Andrew J. Ma oney <AMa oney@kre nd er.com>
Sent: Tuesday, August 31, 2021 11:53 AM EDT
To: John Hartney <JHartney@kre nd er.com>
Subject: RE: Hartney dec arat on on Jarrah Search

Court actually asked us to cover June 1 2021 to Aug 1 2021

bel eve asked you only to look at June 17 (day one of Jarrah depo) through July 15 when story came out

From: John Hartney
Sent: Tuesday, August 31, 2021 11:30 AM
To: Andrew J. Ma oney <AMa oney@kre nd er.com>
Subject: Re: Hartney dec arat on on Jarrah Search

A so what was the date range ?

John Hartney
LAN Adm n strator

Kreindler & Kreindler LLP

485 Lexington Ave
New York NY 10017

T 212 973 3491

E mail jhartney@kreindler.com

F 212 972 9432

Web www.kreindler.com

ease co s de e e v o e befo e p g s e a

From: Andrew J. Ma oney <AMa oney@kre nd er.com>
Sent: Tuesday, August 31, 2021 11:28 AM
To: John Hartney <JHartney@kre nd er.com>
Subject: RE: Hartney dec arat on on Jarrah Search

m_s_koff@yahoo_nc.com and m_s_koff@oath.com

also f Fawcett sent the transcript to our consultant need to know date

From: John Hartney
Sent: Tuesday, August 31, 2021 10:59 AM
To: Andrew J. Ma oney <AMa oney@kre nd er.com>
Subject: Re: Hartney dec arat on on Jarrah Search

I wou d ke to redo the searches on the journa st's ema s address don't fee conf dant searched both ema s addresses can you send me the two ema addresses?

John Hartney
LAN Adm n strator

Kreindler & Kreindler LLP

485 Lexington Ave
New York NY 10017

T 212 973 3491

E mail jhartney@kreindler.com

F 212 972 9432

Web www.kreindler.com

From: Andrew J. Ma oney <AMa oney@kre nd er.com>
Sent: Monday, August 30, 2021 4:06 PM
To: John Hartney <JHartney@kre nd er.com>
Subject: Hartney dec arat on on Jarrah Search

Here s my frst draft Please rev ew for accuracy Let me know f you have quest ons or changes or add t ons after wh ch w ll share w th Megan and Steve

From: John Hartney <JHartney@krendler.com>
Sent: Tuesday, August 31, 2021 12:01 PM EDT
To: Andrew J. Maoney <AMaoney@krendler.com>
Subject: Re: Hartney dec arat on on Jarrah Search

yes your right

John Hartney
LAN Administrator

Kreindler & Kreindler LLP
485 Lexington Ave T 212 973 3491 E-mail jhartney@krendler.com
New York, NY 10017 F 212 972 9432 Web www.krendler.com
ease to see before you go

From: Andrew J. Maoney <AMaoney@krendler.com>
Sent: Tuesday, August 31, 2021 11:56 AM
To: John Hartney <JHartney@krendler.com>
Subject: RE: Hartney dec arat on on Jarrah Search

thank you also searched "s koff" correct? Wouldn't that cover all of them desp te var at ons?

From: John Hartney
Sent: Tuesday, August 31, 2021 11:53 AM
To: Andrew J. Maoney <AMaoney@krendler.com>
Subject: Re: Hartney dec arat on on Jarrah Search

The email address searched on was mskoff@verizonmeda.com so he has three email addresses

John Hartney
LAN Administrator

Kreindler & Kreindler LLP
485 Lexington Ave T 212 973 3491 E-mail jhartney@krendler.com
New York, NY 10017 F 212 972 9432 Web www.krendler.com
ease to see before you go

From: Andrew J. Maoney <AMaoney@krendler.com>
Sent: Tuesday, August 31, 2021 11:28 AM
To: John Hartney <JHartney@krendler.com>
Subject: RE: Hartney dec arat on on Jarrah Search

mskoff@yahoo.com and mskoff@oath.com

also if Fawcett sent the transcript to our consultant need to know date

From: John Hartney
Sent: Tuesday, August 31, 2021 10:59 AM
To: Andrew J. Maoney <AMaoney@krendler.com>
Subject: Re: Hartney dec arat on on Jarrah Search

I would like to redo the searches on the journalist's email addresses don't feel confident searched both email addresses can you send me the two email addresses?

John Hartney
LAN Administrator

Kreindler & Kreindler LLP
485 Lexington Ave T 212 973 3491 E-mail jhartney@krendler.com
New York, NY 10017 F 212 972 9432 Web www.krendler.com
ease to see before you go

From: Andrew J. Maoney <AMaoney@krendler.com>
Sent: Monday, August 30, 2021 4:06 PM
To: John Hartney <JHartney@krendler.com>
Subject: Hartney dec arat on on Jarrah Search

Here is my first draft Please review for accuracy Let me know if you have questions or changes or add ons after which will share with Megan and Steve

From: John Fawcett <Jfawcett@krendler.com>
Sent: Wednesday, September 01, 2021 9:48 AM EDT
To: Andrew J. Maoney <AMaoney@krendler.com>
Subject: RE:

It was not under seal

From: Andrew J. Maoney <AMaoney@krendler.com>
Sent: Wednesday, September 1, 2021 9:45 AM
To: John Fawcett <Jfawcett@krendler.com>
Subject: FW:

Was this privilege offered publicly?

From: John Hartney <JHartney@krendler.com>
Sent: Wednesday, September 1, 2021 9:07 AM
To: Andrew J. Maoney <AMaoney@krendler.com>
Subject: FW:

This was a hit on searching his office three email addresses

From: John Fawcett
Sent: Monday, July 12, 2021 11:38 AM
To: Michael Iskoff <mskoff@verizonmedica.com>
Subject:

John Fawcett

 **Kreindler & Kreindler LLP**
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Email fawcett@krendler.com
Web www.krendler.com

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It may contain confidential and/or privileged information.
Any unauthorized review, use, disclosure or distribution is prohibited.

From: Andrew J. Maloney <AMaloney@kreindler.com>
Sent: Thursday, September 02, 2021 4:16 PM EDT
To: John Hartney <JHartney@kreindler.com>; Debra Pagan <dpagan@kreindler.com>
Subject: FW: Sharefile 9/11 internal investigation

Debbie, can you send me and John a copy of the email you sent to Thea Capone that had a copy of the Jarrah transcript.

I am not sure why he would not have found that or the one Fawcett sent to **Redacted**

From: John Hartney <JHartney@kreindler.com>
Sent: Thursday, July 29, 2021 12:29 PM
To: Andrew J. Maloney <AMaloney@kreindler.com>
Subject: RE: Sharefile 9/11 internal investigation

If you look at the spreadsheet column ItemName it shows that he downloaded

/Dep Videos and Transcripts/Faisal al Muhanna

/Dep Videos and Transcripts/Majed al Mersal

/Dep Videos and Transcripts/Chas Freeman

/Dep Videos and Transcripts/Ismail Mana

/Dep Videos and Transcripts/Roy Olivier

From: Andrew J. Maloney <AMaloney@kreindler.com>
Sent: Thursday, July 29, 2021 12:23 PM
To: John Hartney <JHartney@kreindler.com>
Subject: RE: Sharefile 9/11 internal investigation

Yes please check to see if it was emailed to anyone outside of KK.

Of course we needed to know if it was sent to reporter Isikoff, but we will also be asked if it was sent to someone else who may have in turn sent it to Isikoff.

On the shared file server I see one download on July 5 by **Redacted** (one of our translators) but it does not say what was downloaded. Is there a way to know if he downloaded the Jarrah transcript?

From: John Hartney <JHartney@kreindler.com>
Sent: Thursday, July 29, 2021 12:17 PM
To: Andrew J. Maloney <AMaloney@kreindler.com>
Subject: RE: Sharefile 9/11 internal investigation

I thought you ask me if anyone had sent the email to that particular reporter I can go back and find instances that the transcript was to anyone

Attached is the activity on the on Julia's shared folder Dep Videos and Transcripts

From: Andrew J. Maloney <AMaloney@kreindler.com>
Sent: Thursday, July 29, 2021 11:51 AM
To: John Hartney <JHartney@kreindler.com>
Subject: FW: Sharefile 9/11 internal investigation

Hi John,

We need to prioritize with some urgency that you can confirm (possibly in a sworn declaration) that you checked outgoing email boxes for the KK lawyers and staff to see if anyone forwarded the Jarrah deposition transcript outside the firm.

You told me on Monday that you checked and found no such outgoing emails. But John Fawcett sent one to **Redacted** one of our authorized consultants and Debbie said she also emailed a copy to Dorthea Capaone at Baumeister. Shouldn't your search have found these two?

Next question with regards to the file share server. Julia gave me list of who has access to that data base (below). Is there any way to determine who accessed, downloaded and possibly emailed the Jarrah depo transcript from that data base?

From: Andrew J. Maloney <AMaloney@kreindler.com>
Sent: Thursday, July 29, 2021 11:44 AM
To: Andrew J. Maloney <AMaloney@kreindler.com>
Subject: FW: Sharefile

Here is a list of everyone on the Sharefile with access to the Jarrah Dep.

Steve Pounian
Jim Kreindler
Megan Bennett
AJM
John Fawcett
Debra Pagan
John Hartney
Julia Sienski

Carolyn Martinez (Baumeister)
Robert Sheps
Gavin Simpson

Larry Dunham

Emile Nakhleh
Gary Schroen

Redacted

Let me know if you need anything else.

Julia Sienski
Client Liaison.

Kreindler & Kreindler LLP

485 Lexington Ave
New York, NY 10017

T: 212.973.3492 · E-mail: jsienski@kreindler.com
F: 212.972.9432 · Web: www.kreindler.com

 Please consider the environment before printing this e-mail.

From: Andrew J. Maloney <AMaloney@kreindler.com>
Sent: Thursday, September 02, 2021 5:03 PM EDT
To: John Hartney <JHartney@kreindler.com>
Subject: FW: Three deps for review FIRST EMAIL
Attachment(s): "2021 02-10 Al Qattan Transcript.pdf","Jarrah Deposition Complete ROUGH.pdf","june232021.txt"

Redacted

Sent: Wednesday, September 1, 2021 4:12 PM
To: Andrew J. Maloney <AMaloney@kreindler.com>
Subject: Fw: Three deps for review FIRST EMAIL

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you are expecting the link or attachment from the sender and know the content is safe.

Sent with [ProtonMail](#) Secure Email.

----- Original Message -----

On Tuesday, July 6th, 2021 at 10:30 PM, John Fawcett <Jfawcett@kreindler.com> wrote:

You can't email these around to people that haven't signed the protective order.

John Fawcett

 **Kreindler & Kreindler LLP**
485 Lexington Ave
New York, NY 10017 T: 212.973.3469 E-mail: jfawcett@kreindler.com
F: 212.972.9432 Web: www.kreindler.com

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From: Megan Bennett <Mbenett@kreindler.com>
Sent: Friday, September 24, 2021 11:47 AM EDT
To: John Hartney <JHartney@kreindler.com>; John Fawcett <Jfawcett@kreindler.com>; Debra Pagan <dpagan@kreindler.com>; Julia Sienski <jsienski@kreindler.com>; Lisa Ranieri <LRanieri@kreindler.com>
CC: Jim Kreindler <JKreindler@kreindler.com>; Steven R. Pounian <Spounian@kreindler.com>; Andrew J. Maloney <AMaloney@kreindler.com>
Subject: IMPORTANT - 9/11 MDL - Declarations Due on Monday
Attachment(s): "Netburn 2021 8-30 Order re Michael Isikoff declarations.pdf"

All –

Late yesterday, Judge Netburn issued an order requiring that our declarations in connection with the Yahoo! News story about Jarrah be filed on Monday.

I believe that the only people in the office who received or reviewed the transcript are on this email. I am preparing all declarations and will circulate asap – we will need original signatures on each declaration.

Lisa – can you help with compiling the documents and getting them filed on Monday?

John Hartney – we should talk after I send you your draft declaration.

I'm attaching the order that describes what must be included in the declarations – for KK attorneys the relevant section of the order is at p. 1, paras 1-4; for Hartney it is page two para 2; and for everyone else it is page two para 1 (all within Section A). I've included the language below, as well.

If anyone here knows of anyone else at KK (including any of our experts, consultants, etc.) who accessed or received a copy of the Jarrah transcript (rough or final) please let me know.

Call me on **Redacted** today with any questions. I'm working from home today and probably on Monday, as well.

Thanks
Megan

A. Kreindler & Kreindler

The four attorneys from Kreindler & Kreindler identified in the Court's Order at ECF No. 7011 are directed to file supplemental declarations that: 1. identify all communications with Michael Isikoff or anyone acting on his behalf, whether oral or written, from June 1, 2021, to August 1, 2021. Any written communication must be provided to the Court;

2. declare whether they have ever discussed the contents of the Musaad Al Jarrah deposition with Michael Isikoff or anyone acting on his behalf. Any communication must be described in detail, including whether portions of the transcript were read or testimony was described;

3. state every person with whom they shared the Al Jarrah deposition transcript who has not already supplied the Court with a declaration in this investigation; and

4. state every person that they know had access to the deposition transcripts who has not already supplied a declaration in this investigation.

At least one of these declarations must describe, in detail, the firm's internal investigation that was undertaken in response to the breach of the Protective Orders.

In addition, the Court orders that the following additional declarations be provided:

1. a declaration from any party identified in the supplemental declarations described above employed by or acting at the direction of Kreindler & Kreindler. This shall include the paralegal identified in Paragraph Four of the Megan Wolfe Bennett Declaration, ECF No. 7016 at 3. These declarations shall (i) address whether the declarant shared with anyone any portion of the Al Jarrah deposition transcript (either by providing copies of any portion of the transcript, reading any portion of the transcript, or describing it); and (ii) identify and describe all communications with Michael Isikoff or anyone acting on his behalf, whether oral or written, from June 1, 2021, to August 1, 2021. Any written communication must be provided to the Court; and

2. a declaration from the head of the law firm's information technology group or other comparable figure describing the investigation that was undertaken in response to the breach of the Protective Order. That declaration should demonstrate that a forensic analysis was done to identify who accessed the deposition transcripts, determine the dates of any access, and assess whether anyone from the firm emailed either of the two known Isikoff email addresses (*i.e.*, misikoff@yahoo-inc.com or misikoff@oath.com) or any other email addresses known to be associated with Isikoff. If the investigation revealed such emails sent or received between June 1, 2021, and August 1, 2021, those must be provided.

Megan Bennett
Partner

Kreindler & Kreindler LLP
485 Lexington Ave
New York, NY 10017

T: 212.973.3406 · E-mail: mbenett@kreindler.com
F: 212.972.9432 · Web: www.kreindler.com

 Please consider the environment before printing this e-mail.

From: Steven R. Pounian <Spounian@kreindler.com>
Sent: Friday, September 24, 2021 2:19 PM EDT
To: Megan Bennett <Mbenett@kreindler.com>
Subject: RE: IMPORTANT - 9/11 MDL - Declarations Due on Monday

Hi MB

Let me know if you need any help with this...I can go over things this afternoon or over weekend.

I just read over **Redacted** signed declaration. I would not have included some of the information (certain details about his work history and the date of his retainer for instance). I'm also concerned about sharing **Redacted** name with KSA since he is living abroad. Are we planning to file his declaration with the court only ex parte?

Thx s

From: Megan Bennett <Mbenett@kreindler.com>
Sent: Friday, September 24, 2021 11:48 AM
To: John Hartney <JHartney@kreindler.com>; John Fawcett <Jfawcett@kreindler.com>; Debra Pagan <dpagan@kreindler.com>; Julia Sienski <jsienski@kreindler.com>; Lisa Ranieri <LRanieri@kreindler.com>
Cc: Jim Kreindler <JKreindler@kreindler.com>; Steven R. Pounian <Spounian@kreindler.com>; Andrew J. Maloney <AMaloney@kreindler.com>
Subject: IMPORTANT - 9/11 MDL - Declarations Due on Monday

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John Hartney – we should talk after I send you your draft declaration.

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Call me on **Redacted** today with any questions. I'm working from home today and probably on Monday, as well.

Thanks
Megan

A. Kreindler & Kreindler

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1. identify all communications with Michael Isikoff or anyone acting on his behalf, whether oral or written, from June 1, 2021, to August 1, 2021.

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2. a declaration from the head of the law firm's information technology group or other comparable figure describing the investigation that was undertaken in response to the breach of the Protective Order. That declaration should demonstrate that a forensic analysis was done to identify who accessed the deposition transcripts, determine the dates of any access, and assess whether anyone from the firm emailed either of the two known Isikoff email addresses (*i.e.*, misikoff@yahoo-inc.com or misikoff@oath.com) or any other email addresses known to be associated with Isikoff. If the investigation revealed such emails sent or received between June 1, 2021, and August 1, 2021, those must be provided.

Megan Bennett
Partner

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F: 212.972.9432 Web: www.kreindler.com

 Please consider the environment before printing this e-mail.

From: Andrew J. Maloney
Sent: Friday, July 16, 2021 2:50 PM
To: John Hartney <JHartney@kreindler.com>
Subject: FW: Mussaed al Jarrah - 06.17.21 & 06.18.21 -Terrorist Attacks on September 11, 2001 MDL No. 1570 - FINAL

John,

The attached deposition transcript of Jarrah (a Saudi Embassy official) was sent to us on June 28, 2021. The transcript is under a protective order and not supposed to be shared with clients or the public and only with people on the 9/11 team who have signed the confidentiality order, which includes our consultants.

Yesterday Yahoo News reporter Michael Isikoff published an article purporting to quote from the deposition transcript. He did not reveal who or how he obtained the transcript, but whoever gave it to him violated the court's protective order.

The PEC is investigating if any of the plaintiffs firms leaked the transcript to the media or a client or other who may have leaked it. Our experts are permitted to see a copy and John F sent a copy to Consultant [REDACTED] (which is fine) but did not see any other. Is it possible for you to do a search of KK outgoing emails since June 28 (9:46 pm) that contain this Jarrah transcript? I suppose if you wanted to narrow that even more, you could search the outbox for the 9/11 team: Duke, Jim, Steve, Megan, John F., Debbie, Lisa and Julia S.

Please let me know if this can be done and how burdensome it is. If not too bad, please start to work on it as we may need to respond next week.

From: Production_glkw <Production@golkow.com>
Sent: Monday, June 28, 2021 9:46 PM
To: zRobert Haeifele <rhaeifele@motleyrice.com>; zJodi W. Flowers <flowers@motleyrice.com>; scarter1@cozen.com; Steven R. Poulian <Spoulian@kreindler.com>; Debra Pagan <dpagan@kreindler.com>; Erybicki@andersonkill.com; thery@motleyrice.com; jhaileselassie@motleyrice.com; Steven R. Poulian <Spoulian@kreindler.com>; Megan Benett <Mbenett@kreindler.com>; Jim Kreindler <JKreindler@kreindler.com>; Andrew J. Maloney <AMalone@kreindler.com>
Cc: Finalz <Finalz@golkow.com>; Exhibits_glkw <exhibits2@litigationservices.com>
Subject: Mussa'ae al Jarrah - 06.17.21 & 06.18.21 -Terrorist Attacks on September 11, 2001 MDL No. 1570 - FINAL

Please find attached the FINAL e-transcript and PDF bundle transcript of Mussaed al Jarrah.

Kindly note the exhibits are not yet available. We will send them in a separate email as soon as they're available.

This attachment is in PDF format and contains the condensed mini transcript, Ascii (.txt) and word index. To obtain these other files, select the bookmarks tab on the left side menu in Adobe Reader or select the attachments tab. The .PTX attachment is in e-transcript format, which requires a downloadable viewer in order to open it. You can obtain the PTX viewer free of charge at the following link: <http://store.westlaw.com/software/ebundle/viewer/default.aspx>. You need only download the viewer once.

If we can be of any further assistance in this matter, please do not hesitate to contact us.

Thank you,
Chrissy Tafel
Case Manager
One Liberty Place
1650 Market Street, Suite 5150
Philadelphia, Pennsylvania 19103
www.Golikow.com | 215.586.4223 | 877.370.DEPS | ctafel@golikow.com



In light of the Coronavirus pandemic and in an effort to keep our clients and staff safe, Golkow Litigation Services is modifying our production of hard copy materials. Printed transcripts/exhibits will ONLY be produced upon request. As always, we thank you for your continued support and understanding and hope you remain safe and well.

From: Andrew J. Maloney <AMaloney@kreindler.com>
Sent: Friday, September 24, 2021 3:28 PM EDT
To: Megan Bennett <Mbenett@kreindler.com>
Subject: FW: Isikoff
Attachment(s): "FW Thurs. July 1st 230pm - Isikoff - Conspiracyland Interview.msg", "FW checking in.msg", "FW [E] Re checking in.msg", "FW Thurs. July 1st 230pm - Isikoff - Conspiracyland Interview.msg", "FW checking in.msg", "FW [E] Re checking in.msg"

From: Andrew J. Maloney
Sent: Thursday, July 22, 2021 10:55 AM
To: Jim Kreindler <JKreindler@kreindler.com>; Steven R. Pounian <Spounian@kreindler.com>; John Fawcett <Jfawcett@kreindler.com>; Megan Bennett <Mbenett@kreindler.com>
Subject: Isikoff

Hartney found only the attached emails from/to KK and Isikoff.
Its Jim communicating with him about our desire to move to lift the gag order. There is no mention of Jarrah or any deposition or anything else.
While KSA would likely make an unsupported argument that more was discussed, particularly given the timing, there was no evidence of that in the emails and no attachments.

I think it is fair to say the tech search revealed no KK communication with Isikoff about Jarrah or any deposition and no Jarrah depo transcript was sent outside the firm save for one sent by John Fawcett to one of our investigating consultants, who signed the protective order

Redacted

From: Andrew J. Maoney <AMaoney@krendler.com>
Sent: Friday, September 24, 2021 3:29 PM EDT
To: Megan Bennett <Mbenett@krendler.com>
Subject: FW:
Attachment(s): "2021 5-6 Unclassified_privileged_updated_May 6 2021.pdf"

From: John Hartney <JHartney@krendler.com>
Sent: Wednesday, September 1, 2021 9:07 AM
To: Andrew J. Maoney <AMaoney@krendler.com>
Subject: FW:

This was a hit on searching 's koff three email addresses

From: John Fawcett
Sent: Monday, July 12, 2021 11:38 AM
To: Michael Iskoff <miskoff@verizonmeda.com>
Subject:

John Fawcett

 **Kreindler & Kreindler LLP**
485 Lexington Ave T 212 973 3469 E mail fawcett@krendler.com
New York NY 10017 F 212 972 9432 Web www.krendler.com

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From: Andrew J. Maloney <AMaloney@kreindler.com>
Sent: Friday, September 24, 2021 3:29 PM EDT
To: Megan Bennett <Mbenett@kreindler.com>
Subject: FW: Sharefile 9/11 internal investigation

From: John Hartney <JHartney@kreindler.com>
Sent: Thursday, July 29, 2021 12:29 PM
To: Andrew J. Maloney <AMaloney@kreindler.com>
Subject: RE: Sharefile 9/11 internal investigation

If you look at the spreadsheet column ItemName it shows that he downloaded

/Dep Videos and Transcripts/Faisal al Muhanna

/Dep Videos and Transcripts/Majed al Mersal

/Dep Videos and Transcripts/Chas Freeman

/Dep Videos and Transcripts/Ismail Mana

/Dep Videos and Transcripts/Roy Olivier

From: Andrew J. Maloney <AMaloney@kreindler.com>
Sent: Thursday, July 29, 2021 12:23 PM
To: John Hartney <JHartney@kreindler.com>
Subject: RE: Sharefile 9/11 internal investigation

Yes please check to see if it was emailed to anyone outside of KK.

Of course we needed to know if it was sent to reporter Isikoff, but we will also be asked if it was sent to someone else who may have in turn sent it to Isikoff.

On the shared file server I see one download on July 5 by **Redacted** (one of our translators) but it does not say what was downloaded. Is there a way to know if he downloaded the Jarrah transcript?

From: John Hartney <JHartney@kreindler.com>
Sent: Thursday, July 29, 2021 12:17 PM
To: Andrew J. Maloney <AMaloney@kreindler.com>
Subject: RE: Sharefile 9/11 internal investigation

I thought you ask me if anyone had sent the email to that particular reporter I can go back and find instances that the transcript was to anyone

Attached is the activity on the on Julia's shared folder Dep Videos and Transcripts

From: Andrew J. Maloney <AMaloney@kreindler.com>
Sent: Thursday, July 29, 2021 11:51 AM
To: John Hartney <JHartney@kreindler.com>
Subject: FW: Sharefile 9/11 internal investigation

Hi John,

We need to prioritize with some urgency that you can confirm (possibly in a sworn declaration) that you checked outgoing email boxes for the KK lawyers and staff to see if anyone forwarded the Jarrah deposition transcript outside the firm.

You told me on Monday that you checked and found no such outgoing emails. But John Fawcett sent one to **Redacted** one of our authorized consultants and Debbie said she also emailed a copy to Dorthea Capaone at Baumeister. Shouldn't your search have found these two?

Next question with regards to the file share server. Julia gave me list of who has access to that data base (below). Is there any way to determine who accessed, downloaded and possibly emailed the Jarrah depo transcript from that data base?

From: Andrew J. Maloney <AMaloney@kreindler.com>
Sent: Thursday, July 29, 2021 11:44 AM
To: Andrew J. Maloney <AMaloney@kreindler.com>
Subject: FW: Sharefile

Here is a list of everyone on the Sharefile with access to the Jarrah Dep.

Steve Pounian
Jim Kreindler
Megan Bennett
AJM
John Fawcett
Debra Pagan
John Hartney
Julia Sienski

Carolyn Martinez (Baumeister)
Robert Sheps
Gavin Simpson

Larry Dunham

Emile Nakhleh
Gary Schroen

Redacted

Let me know if you need anything else.

Julia Sienski
Client Liaison.

Kreindler & Kreindler LLP

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F: 212.972.9432 · Web: www.kreindler.com

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From: Andrew J. Maloney
Sent: Friday, September 24, 2021 3:28 PM EDT
To: Megan Bennett <Mbenett@kreindler.com>
Subject: FW: Isikoff
Attachment(s): "FW Thurs. July 1st 230pm - Isikoff - Conspiracyland Interview.msg", "FW checking in.msg", "FW [E] Re checking in.msg", "FW Thurs. July 1st 230pm - Isikoff - Conspiracyland Interview.msg", "FW checking in.msg", "FW [E] Re checking in.msg"

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Subject: Isikoff

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While KSA would likely make an unsupported argument that more was discussed, particularly given the timing, there was no evidence of that in the emails and no attachments.

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Redacted

From: Megan Bennett <Mbenett@kredner.com>
Sent: Friday, September 24, 2021 5:17 PM EDT
To: John Hartney <JHartney@kredner.com>
Subject: RE: do you want me to wait for the Decaration? to discuss
Attachment(s): "Hartney Decaration.docx"

Actually use this version

From: Megan Bennett
Sent: Friday, September 24, 2021 5:17 PM
To: John Hartney <JHartney@kredner.com>
Subject: RE: do you want me to wait for the Decaration? to discuss

So sorry here's a draft. We will probably change the language slightly. Can you check to make sure the basic facts are accurate though?

From: John Hartney
Sent: Friday, September 24, 2021 5:14 PM
To: Megan Bennett <Mbenett@kredner.com>
Subject: do you want me to wait for the Decaration? to discuss

Or are we going to do it Monday?

From: Megan Bennett <Mbenett@krendler.com>
Sent: Saturday, September 25, 2021 1:37 PM EDT
To: Steven R. Pounan <Spounan@krendler.com>
Subject: RE: Pounan Declaration on SRP EDITS
Attachment(s): "Netburn 2021 8-30 Order re Mchae Iskoff declarations.pdf"

Yes we can say that was stucking to the "only answer what she asked for" because I'm so irritated by this but probably better to add that to everyone's declarations and try to avoid yet another of the court's shots across our bow

I'm good with your changes though what had in para 7 of your declaration mirrored the language of the court order (attached here) am fine changing it or keep it as it was whatever you think

left JF a voice mail to ask him the same things you emailed him about will edit this declaration once we hear back. We also need to find out from JPK how many times he talked to Iskoff if he can recall when and what they discussed

Also everyone should understand that they need to be sure that the declarations are correct and that they can stand by all of the statements if they were to testify under oath in court am sure the answers yes but will confirm with each declarant individually

Thanks
Megan

From: Steven R. Pounan
Sent: Saturday, September 25, 2021 1:29 PM
To: Megan Bennett <Mbenett@krendler.com>
Subject: Pounan Declaration on SRP EDITS

I made changes attached. I can help on the others once we agree on a form. Can't everyone say "I have no idea how Mchae Iskoff got the transcript"?

From: Megan Bennett <Mbenett@kreindler.com>
Sent: Saturday, September 25, 2021 4:49 PM EDT
To: Steven R. Pounian <Spounian@kreindler.com>
Subject: RE: Pounian Declaration SRP EDITS 330p
Attachment(s): "Benett Declaration.docx", "Fawcett Declaration.docx", "Hartney Declaration.docx", "Kreindler Declaration.docx", "Maloney Declaration.docx", "Pagan Declaration.docx", "Pounian Declaration.docx", "Ranieri Declaration.docx", "Sienski Declaration.docx", "████████ Declaration.pdf"

Here are all of the declarations – including mine, which somehow I seem to have forgotten to draft earlier (wishful thinking), even though I named you me...

Let's talk to Fawcett and Jim tomorrow if possible. I'll work on the letter-motion re █████ now and draft a short letter to be filed with the declarations.

From: Steven R. Pounian
Sent: Saturday, September 25, 2021 3:46 PM
To: Megan Bennett <Mbenett@kreindler.com>
Subject: RE: Pounian Declaration SRP EDITS 330p

On the bullet points paragraph when we reference the Court's order we should add the ECF No.

From: Megan Bennett <Mbenett@kreindler.com>
Sent: Saturday, September 25, 2021 3:44 PM
To: Steven R. Pounian <Spounian@kreindler.com>
Subject: Re: Pounian Declaration SRP EDITS 330p

Great. I will revise and send to you. It may not be for 45 mins or so.

Sent from my iPhone

On Sep 25, 2021, at 3:39 PM, Steven R. Pounian <Spounian@kreindler.com> wrote:

I can look over the others if you have more changes – just let me know

From: Steven R. Pounian
Sent: Saturday, September 25, 2021 3:39 PM
To: Megan Bennett <Mbenett@kreindler.com>
Subject: Pounian Declaration SRP EDITS 330p

I agree – made a few small changes. Thx s

From: Megan Bennett <Mbenett@krendler.com>
Sent: Sunday, September 26, 2021 12:56 PM EDT
To: John Hartney <JHartney@krendler.com>
Subject: Iskoff emails

Hi. I got Jim's (thank you) - can you send me the email from Fawcett to Isikoff? Thanks. Megan
Sent from my iPhone

From: Mbenett@kredner.com <Mbenett@kredner.com>

Sent: Sunday, September 26, 2021 3:58 PM EDT

To: John Hartney <JHartney@kredner.com>

Subject: Re:

Can you send it to me as a stand-alone email like the ones from JPK?

Sent from my Phone

On Sep 26, 2021, at 2:55 PM, John Hartney <JHartney@kredner.com> wrote:

Sorry there was one

From: John Fawcett

Sent: Monday, July 12, 2021 11:38 AM

To: Michael Iskoff <miskoff@verizonmeda.com>

Subject:

John Fawcett

<image001.jpg> Kreindler & Kreindler LLP
485 Lexington Ave T 212 973 3469 E mail jfawcett@kreindler.com
New York NY 10017 F 212 972 9432 Web www.kreindler.com
ease to see before going to see a
<2021 5-6 Unclassified_privilege_updated_May 6 2021.pdf>

From: Megan Bennett <Mbenett@kreindler.com>
Sent: Sunday, September 26, 2021 5:34 PM EDT
To: Steven R. Pounian <Spounian@kreindler.com>
Subject: Isikoff - Kreindler
Attachment(s): "Kreindler Declaration.docx"

Hi –
Mystery solved – John Hartney forgot to forward to me the first email, which has the subject line “checking in.” And Isikoff called Jim twice the week before that email exchange. I’ve got all of the emails here:

Redacted

Thanks
Megan

Megan Bennett
Partner

 Kreindler & Kreindler LLP
485 Lexington Ave
New York, NY 10017
T: 212.973.3406 · E-mail: mbenett@kreindler.com
F: 212.972.9432 · Web: www.kreindler.com

 Please consider the environment before printing this e-mail.

From: Megan Bennett <Mbenett@krendler.com>
Sent: Sunday, September 26, 2021 5:43 PM EDT
To: John Hartney <JHartney@krendler.com>
Subject: Is koff search terms

Just confirming

need all incoming and outgoing and in any delete folders of the following email addresses between June 1 and August 1
to misikoff@yahoo-inc.com, misikoff@oath.com, misikoff@verizonmedia.com and misikoff52@gmail.com

Please send all to me in the original/native format

Thanks!
Megan

Megan Bennett
Partner

 **Kreindler & Kreindler LLP**
485 Lexington Ave T 212 973 3406 E mail mbenett@krendler.com
New York NY 10017 F 212 972 9432 Web www.krendler.com

Please consider before you e-mail this document.

From: Megan Bennett <Mbenett@krendler.com>
Sent: Monday, September 27, 2021 8:23 AM EDT
To: Steven R. Pounan <Spounan@krendler.com>
Subject: RE: Kreider Decarat on 550p
Attachment(s): "Kreider Decarat on.docx"

had to add more in light of a few more emails newest version attached

have not heard back from Fawcett and JPK and do not know about the privilege log. Should we all John together this morning?

From: Steven R. Pounan
Sent: Sunday, September 26, 2021 5:52 PM
To: Megan Bennett <Mbenett@krendler.com>
Subject: Kreider Decarat on 550p

made few edits and added sentence re the emails. Not sure where things stand with privilege log question

From: Megan Bennett <Mbenett@kredner.com>
Sent: Monday, September 27, 2021 9:13 AM EDT
To: Ju a S ensk <jsensk@kredner.com>
Subject: S ensk Dec arat on
Attachment(s): "S ensk Dec arat on.docx"

H Jul a

Please review this carefully and make sure this is correct you will be signing it under penalty of perjury so we have to make sure this is accurate

Call or email with any edits or comments

A final version must be signed by hand today and we will be filing all declarations today

Thanks
Megan

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
-----------------------------------------------	------------------------

This document relates to:

All Actions

DECLARATION OF JULIA SIENSKI

I, Julia Sienski, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury the following:

1. I am a client liaison and case manager at Kreindler & Kreindler LLP (“Kreindler”) and am involved in Kreindler’s work in the *In re Terrorist Attacks on September 11, 2001* suit.
2. I was asked to provide a declaration in connection with this Court’s inquiry into how investigative reporter Michael Isikoff obtained a copy or portions of the deposition transcript of Kingdom of Saudi Arabia official Musaed al-Jarrah (“Jarrah”).
3. I have no idea how Isikoff obtained a copy of the Jarrah transcript.
4. Kreindler paralegal Debra Pagan forwarded to me the email with the rough transcripts of former Kingdom of Saudi Arabia employee Musaed al-Jarrah (“Jarrah”) and the link from court reporters Golkow Litigation Services providing access to the final Jarrah transcripts. I saved the rough Jarrah transcripts on Kreindler’s server on June 17, 2021 and June 18, 2021 and the final Jarrah transcripts on June 29, 2021. I also uploaded the final Jarrah transcript to Kreindler’s cloud-based storage system on June 29, 2021.
5. My specific answers to the inquiry of this Court’s Order, ECF No. 7082 at 2, (set forth in italics) are underscored below:

- i. *whether the declarant shared with anyone any portion of the Al Jarrah deposition transcript (either by providing copies of any portion of the transcript, reading any portion of the transcript, or describing it);*
 - I have not shared any portion of the Jarrah transcript with anyone.
- *identify and describe all communications with Michael Isikoff or anyone acting on his behalf, whether oral or written, from June 1, 2021, to August 1, 2021.*
 - I have never had any communications with Isikoff or anyone acting on his behalf.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
September 27, 2021

KREINDLER & KREINDLER LLP

By: _____
JULIA SIENSKI
485 Lexington Avenue
New York, New York 10017
Tel.: 212-687-8181

From: John Fawcett
Sent: Monday, September 27, 2021 12:23 PM EDT
To: Steven R. Poun an <Spoun an@kred er.com>; Megan Bennett <Mbenett@kred er.com>
Subject: FW:
Attachment(s): "Dec arat on.docx"

Declaration

I have been working for the 9/11 Families as a consultant to Kreindler & Kreindler since 2002. I sent a redacted version of the transcript of the deposition of Musaed al Jarrah to Michael Isikoff in early July, 2021. The redacted portions related to the sections of the deposition which were taken subject to the FBI protective order and irrelevant to the issue at hand, evidence of Jarrah's use of child pornography.

Musaed al Jarrah was the subject of an FBI investigation known as Operation Encore into the Saudi government's support to the 9/11 Plot. Musaed al Jarrah instructed two other Saudi government officials Fahad al Thumairy and Omar al Bayoumi to assist the hijackers in carrying out the plot which resulted in thousands of deaths and injuries.

Musaed al Jarrah was an employee of the Saudi government at its Embassy in Washington DC from 1991 until 2006. During this period of time, and in the locale of Washington DC and Northern Virginia, Musaed al Jarrah committed the criminal acts of terrorism support and possession of child pornography.

No one at Kreindler & Kreindler instructed me to send the transcript to Michael Isikoff nor did anyone at Kreindler & Kreindler have any knowledge of my sending it to Mr. Isikoff. Nor did any consultant or anyone else have any knowledge of my sending the transcript to Mr. Isikoff. Until today, no one aside from myself and Michael Isikoff, was aware that I sent the Jarrah transcript to him.

I sent the transcript to Mr. Isikoff via a non-Kreindler email address. I did so to prevent the partners and staff of Kreindler & Kreindler from knowing about my intended action and to prevent them from stopping me, should they wish to do so.

A protective order should not extend to cover evidence of a criminal act such as possessing and viewing child pornography. The FBI continued to protect Musaed al Jarrah by calling the relationship between the FBI and Jarrah a 'State Secret.' The Kingdom of Saudi Arabia continued to protect their Embassy official by invoking Diplomatic Immunity. Neither has brought legal action despite clear evidence a crime had been committed and there is no evidence to demonstrate that Jarrah has ceased his criminal activity.

The protective order should not be used to cover up evidence of a crime that is not being adjudicated.

If the Saudi Government, the FBI, and the Federal Court of the Southern District of New York continue to protect Musaed al Jarrah rather than prosecute him, then the public at least must be forewarned in order to have some chance to protect themselves. The only venue for such warning is the media.

After the revelations at the deposition that he was a child pornographer, I could not allow Musaed al Jarrah's criminal acts to remain secret, when I had the opportunity to do something about it.

I released the information.

I accept all responsibility for my actions.

Under penalty of perjury, I swear this declaration to be the truth.

September , 2021

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.
SUMNER SQUARE
1615 M STREET, N.W.
SUITE 400
WASHINGTON, D.C. 20036-3215
—
(202) 326-7900
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(202) 326-7999

July 23, 2021

FILED UNDER SEAL – SUBJECT TO MDL PROTECTIVE ORDER

Via ECF (under seal) and electronic mail

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001, 03-md-1570 (GBD) (SN)*

Dear Judge Netburn:

I write on behalf of Defendant Kingdom of Saudi Arabia (“Saudi Arabia”) to seek relief for a violation of the general protective order in this litigation, ECF No. 1900 (“MDL Protective Order”), through unauthorized disclosure of Musaed Al Jarrah’s confidential deposition transcript to Michael Isikoff of Yahoo! News. Isikoff recently published details from the transcript, including verbatim quotations. *See Ex. A (Michael Isikoff, FBI tried to flip Saudi official in 9/11 investigation, Yahoo! News, July 15, 2021).* His article states that “a copy of the deposition – with some redactions for law-enforcement sensitive material – was obtained exclusively by Yahoo News.” *Id.* at 2. The Court should order targeted discovery to determine who disclosed the transcript as a step towards enforcement of the MDL Protective Order.

1. On June 17 and June 18, 2021, the Plaintiffs’ Executive Committees (“Plaintiffs”) took Al Jarrah’s deposition. *See Ex. B* (excerpts of Al Jarrah deposition transcripts). Al Jarrah is a former employee who worked in Saudi Arabia’s Embassy during the relevant period. He had no obligation to testify. He voluntarily agreed to do so in part given the confidentiality protections in place. Undersigned counsel represented Al Jarrah in connection with his deposition. At the deposition, Plaintiffs introduced exhibits that were subject to the MDL Protective Order, and Al Jarrah answered questions about those exhibits. *See Ex. B, [REDACTED]* [REDACTED]. Those exhibits included documents that Saudi Arabia had voluntarily produced from the files of its Embassy that the Court has ruled are protected by the Vienna Convention on Diplomatic Relations and must be filed only under seal. *See id.* [REDACTED]; *see also* ECF No. 4696 (sealing order), *objections overruled*, ECF No. 6532. [REDACTED]

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

The Honorable Sarah Netburn
July 23, 2021
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[REDACTED]

At the close of Al Jarrah's deposition, counsel for Saudi Arabia and Al Jarrah designated the deposition as confidential. *See id.* at 609:17-21. The court reporter marked the transcripts as confidential. *See id.* (top line of all pages). On June 9-11, 2021 and June 28-30, 2021, Plaintiffs also took the depositions of Omar Al Bayoumi, and Fahad Al Thumairy. Those depositions also discussed confidential information and the transcripts were also designated as confidential. As set forth in declarations submitted with this motion, Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C. ("Kellogg Hansen"), is the only entity acting on behalf of Saudi Arabia that has received the Al Jarrah, Al Bayoumi, or Al Thumairy transcripts. No person at Kellogg Hansen has sent those transcripts to anyone not authorized to receive them.²

2. Michael Isikoff is a correspondent who covers this litigation. On July 5, 2021, Isikoff sent counsel for Saudi Arabia an email requesting comment on an article he was preparing. Ex. D3, ¶ 4 (Kellogg Decl.) & attach. A. That email asked for "any comments you can make in response to what Jim Kreindler had to say about where things stand – and how the depositions went." *Id.* The quotations attributed to "Jim Kreindler" stated: "If I could tell you now everything we knew about the Saudi role, you could see a resolution in Congress to declare war. I mean, it is so dramatic" and "[w]e are thrilled with how the depositions went . . . I can say that we've exposed all kinds of lies. You know, one witness will contradict another. Each person wants to minimize their own role and point fingers at each other." *Id.* (boldface omitted). No one from Kellogg Hansen responded to Isikoff. *See* Exs. D2, ¶ 5, D3, ¶ 4.

1

[REDACTED]

² Exhibits D1 through D27 are declarations from everyone at Kellogg Hansen who has received or accessed the transcripts in the course of their work. Most who received the transcripts sent them to no one at all. *See* Ex. D3, D5-D27. Those who did share the transcripts sent them only to (1) employees of the firm, *see* Exs. D1, ¶¶ 3-5 (Shen Decl.), D2, ¶ 4 (Rapawy Decl.); (2) counsel for Plaintiffs, *see* Ex. D2, ¶ 3; (3) counsel for Dallah Avco, *see* Ex. D2, ¶ 3, (4) counsel for the FBI, *see* Exs. D1, ¶ 10, D2, ¶ 3; or (5) the Court and its personnel, *see* Ex. D2, ¶ 3, D4, ¶ 3. *See* ECF No. 1900, ¶ III.H.3 (setting out categories of persons authorized to receive confidential material); ECF No. 4255, ¶ 10 (authorizing disclosures of transcripts to FBI).

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

The Honorable Sarah Netburn

July 23, 2021

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On July 15, 2021, Yahoo! News published under Isikoff's byline the article attached as Exhibit A. As noted above, the article states that a "copy of the deposition – with some redactions for law-enforcement sensitive material – was obtained exclusively by Yahoo News." Ex. A, at 2. The FBI has not yet approved any redactions of the Al Jarrah transcripts.

Details in the article corroborate Isikoff's statement that he has a copy of the transcripts. The article correctly identifies the number of pages (more than 600). It quotes verbatim from Al Jarrah's [REDACTED] his denial that before the 9/11 attacks he ever heard the names of Khalid Al Mihdhar and Nawaf Al Hazmi. *Compare* Ex. A, at 4-5 with Ex. B, at [REDACTED]. It also purports to give an exact count of the number of times that Al Jarrah used the words "I don't remember." *See* Ex. A, at 7.

The July 15 article contains no direct quotations attributed to Plaintiffs' counsel. We also have not found any other published article containing the quotations that Isikoff attributed to Plaintiffs' counsel in his July 5 email. But the July 15 article does set out "[t]he families' lawyers[']" point of view on the matters it discusses, describing the Al Jarrah, Al Bayoumi, and Al Thumairy depositions as "frustrating" but stating that "the lawyers are . . . making what they believe can be a powerful circumstantial case." Ex. A, at 7-8. Counsel for Plaintiffs are also quoted by name in other articles that Isikoff has written this month referring to this litigation.³

3. The MDL Protective Order states that a "Receiving Party may use Protected Material . . . only for prosecuting, defending, or attempting to settle this litigation," ECF No. 1900, ¶ III.H.1; that "Protected Material may be disclosed only to the categories of persons and under the conditions described in this order," *id.*; and that "Protected Material must be stored and maintained by a Receiving Party at a location and in a secure manner that ensures that access is limited to the persons authorized under this Order," *id.* ¶ III.H.2. Depositions marked as containing confidential material "shall be treated in accordance with the provisions of this Order." *Id.* ¶ III.G.4. The deposition transcripts here were so marked.

The facts before the Court show that a violation of the MDL Protective Order has occurred. The article's statement that "Yahoo News" had "obtained" a "copy of the deposition," combined with the corroborating details in the article about the contents of the confidential Al Jarrah deposition transcripts, indicate that Isikoff has a copy of those confidential transcripts. He could have obtained them only through a violation of the MDL Protective Order. Isikoff's public and private statements also provide reason to believe that he had substantive discussions with Plaintiffs' counsel concerning the depositions at the time he was preparing the July 15 article.

4. This Court has broad authority to enforce and devise remedies for violations of its discovery orders. Because the MDL Protective Order was issued pursuant to Federal Rule of

³ See Ex. C, at 2, 6 (Michael Isikoff, *Prior to his murder, Jamal Khashoggi offered to help 9/11 victims suing Saudi Arabia*, Yahoo! News, July 10, 2021) (offering an "exclusive account" from Plaintiffs' investigator "Catherine Hunt," and quoting "Jim Kreindler").

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Civil Procedure 26(c), *see* ECF No. 1900 preamble, the Court has authority to enforce it under Federal Rule of Civil Procedure 37(b). *See, e.g., Jay v. Spectrum Brands Holdings, Inc.*, 2015 WL 6437581, at *5 (S.D.N.Y. Oct. 20, 2015) (“[T]his Court has consistently held that a protective order issued under Rule 26(c) can be enforced through Rule 37(b).”); *see also In re Bouchard Transp. Co.*, 2018 WL 1581992, at *1 (S.D.N.Y. Mar. 28, 2018); *Schiller v. City of New York*, 2007 WL 1623108, at *3 (S.D.N.Y. June 5, 2007). In addition, the Court also has “inherent power to enforce [its] own orders” and to “issue orders designed to correct wrongs committed through its process.” *Hunt v. Enzo Biochem, Inc.*, 904 F. Supp. 2d 337, 344 (S.D.N.Y. 2012) (discussing the power to enforce confidentiality orders).

Rule 37(b) states that the Court may “issue further just orders” upon a finding that a discovery order has been violated, including but not limited to sanctions. The Court’s inherent powers include “the control necessarily vested in courts to manage their own affairs so as to achieve the orderly and expeditious disposition of cases.” *Chambers v. NASCO, Inc.*, 501 U.S. 32, 43 (1991). The MDL Protective Order provides that “any violation of this Order is punishable by money damages . . . equitable relief, injunctive relief, sanctions or any other remedy as the Court deems appropriate.” ECF No. 1900, ¶ III.M.2. All of these sources grant the Court flexibility to investigate and remedy the violation of the MDL Protective Order here.

5. The Court should investigate or authorize Saudi Arabia to investigate the circumstances of this serious violation. Saudi Arabia respectfully submits that the Court should follow the procedure suggested in *Schiller v. City of New York* to deal with a similar situation.

In that case, the City of New York and its Police Department (collectively, the “City”) produced confidential police intelligence documents to protestors who alleged they had been wrongfully arrested. *See* 2007 WL 1623108, at *1. The *New York Times* published articles suggesting its reporters had the documents. *See id.* at *2. The City asked the Court to order the protestors’ attorneys to declare under oath whether they had or had not given the *Times* the documents. *See id.* at *4. Judge Francis declined, but said he would “consider granting the relief requested by the defendants” if he “were satisfied that any breach of the protective orders most likely originated with plaintiffs’ counsel.” *Id.* That would require the City to “provide declarations from everyone who had access to the Intelligence Documents, attesting that they did not disclose the documents in violation of the protective order, and identifying everyone to whom they did provide the documents.” *Id.* By doing so, the City could establish “a complete and accurate chain of custody” and its “lack of responsibility for the breach.” *Id.*

Here, Saudi Arabia is showing it was not responsible for the breach of confidentiality by submitting sworn declarations from every individual who, while acting as counsel, or at the direction of counsel for Saudi Arabia in this matter, accessed or received the Al Jarrah deposition transcripts. That is enough to “shift . . . the burden . . . [to] demonstrat[e] . . . innocence,” *id.*, to the other parties who received the transcripts – particularly counsel for Plaintiffs who have been in contact with Isikoff about his recent articles. Saudi Arabia respectfully requests that the Court now direct all other entities or individuals with access to the transcripts to submit declarations to

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

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the Court similar to those submitted by Saudi Arabia. Further, because counsel for Plaintiffs communicated with Isikoff concerning the Al Jarrah, Al Bayoumi, and Al Thumairy depositions at or around the time that Isikoff published the article, the Court should direct similar disclosures as to the Al Bayoumi and Al Thumairy transcripts; and should direct each declarant also to identify, describe, and where applicable produce, communications with Isikoff from June 1, 2021 to the present. A proposed order is being sent to chambers with this letter.

In the alternative, if the Court does not order that the above disclosures be made to the Court directly, Saudi Arabia respectfully requests authorization to conduct limited, targeted party and third-party discovery to investigate this violation of the MDL Protective Order.

Before sending this letter, Saudi Arabia requested the positions of Plaintiffs, Dallah Avco, all parties whose counsel attended the deposition, and the FBI on the relief sought. Various Plaintiffs' firms responded separately, including some not on the Plaintiffs' Executive Committees. All Plaintiffs who responded represented that they had not given the transcripts to Isikoff. Some, but not all, represented that they had no communications with him. Several disagreed that the intervention of the Court was required and suggested a voluntary exchange of information. Dallah Avco consented to the relief requested. The FBI agreed that inquiry was warranted, but asked that the FBI and the Department of Justice ("DOJ") not be required to submit declarations, at least for now.⁴ Saudi Arabia proceeded with this motion because a Court-supervised process is appropriate to investigate this violation of the Court's order and because inquiry into communications with Isikoff is a necessary part of that process.

* * *

As the Second Circuit observed in *Eli Lilly & Co. v. Goldstein*, 617 F.3d 186 (2d Cir. 2010), inability to enforce protective orders would "eviscerate courts' ability to manage discovery, and, hence, litigation." *Id.* at 195. Saudi Arabia has voluntarily produced thousands of pages of confidential material from its Embassy and the highest offices of its government, relying on the MDL Protective Order to keep those documents confidential. Al Jarrah testified voluntarily [REDACTED].

He too should have been able to rely on the MDL Protective Order for protection against the "embarrassment, oppression, or undue burden," Fed. R. Civ. P. 26(c), of having those questions and answers made public. The Court and the parties have also spent untold hours developing and applying rules and procedures to protect confidential information. The party or counsel who disclosed the transcripts to Isikoff has shown contempt for that process. The Court should act to protect the integrity of its proceedings and ensure future respect for its orders.

⁴ Saudi Arabia agrees that the FBI need not submit declarations at this time because, to the best of our knowledge, the FBI had only rough versions of the Al Jarrah transcripts and the page count in the Isikoff article ("more than 600") matches the final versions, not the rough.

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

The Honorable Sarah Netburn
July 23, 2021
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Respectfully submitted,

/s/ *Michael K. Kellogg*

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: Counsel for Plaintiffs, Dallah Avco, and the FBI
All counsel who attended the deposition of Musaed Al Jarrah, Omar Al Bayoumi, or
Fahad Al Thumairy

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**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: TERRORIST ATTACKS ON) Civil Action No. 03 MDL 1570 (GBD) (SN)
SEPTEMBER 11, 2001) ECF Case
)

This document relates to:

All cases

DECLARATION OF MICHAEL K. KELLOGG

I, Michael K. Kellogg, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that:

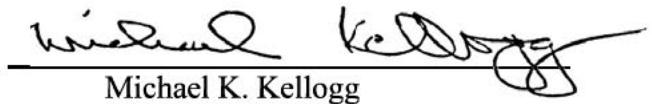
1. I am an attorney with the law firm of Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C. (“Kellogg Hansen”). I represent the Kingdom of Saudi Arabia (“Saudi Arabia”) in the above-captioned action.
2. I have received and accessed copies of the rough and final transcripts of the depositions of Mussaed Al Jarrah (on June 17 and 18, 2021), Omar Al Bayoumi (June 9, 10, and 11, 2021), and Fahad Al Thumairy (June 28, 29, and 30, 2021).
3. I have never provided copies of the rough or final transcripts of these depositions to anyone outside of Kellogg Hansen.
4. I have never shared any copy of the rough or final transcripts of the Al Jarrah, Al Bayoumi, or Al Thumairy depositions with Michael Isikoff. I have no knowledge of anyone at Kellogg Hansen, or anyone working at Kellogg Hansen’s direction, who has shared copies of the rough or final transcript of the Al Jarrah, Al Bayoumi, or Al Thumairy depositions with Mr. Isikoff. Mr. Isikoff has contacted me in the past to request comment on a story he was working

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on, but I have never given him comment about this case. A true and correct copy of a July 5, 2021 email from Mr. Isikoff to me is attached as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: July 20, 2021



Michael K. Kellogg

From: Michael Isikoff <misikoff@verizonmedia.com>
Date: July 5, 2021 at 12:59:34 PM EDT
To: "Kellogg, Michael K." <mkellogg@kellogghansen.com>, mkellog@khhte.com
Subject: [EXTERNAL] questions for 9/11 lawsuit story

Michael Kellogg-

With the depositions of Jarrah, Bayoumi and Thumairy now completed, am doing a story on the state of the 9/11 lawsuit in which I would appreciate any comments you can make in response to what Jim Kreindler had to say about where things stand-- and how the depositions went: **"If I could tell you now everything we knew about the Saudi role, you could see a resolution in Congress to declare war. I mean, it is so dramatic..."** "We are thrilled with how the depositions went,. I can say that we've exposed all kinds of lies. You know, one witness will contradict another. Each person wants to minimize their own role and point fingers at each other."

This would be for a story slated for Wednesday so any comment appreciated by mid afternoon tomorrow.

Mike Isikoff
Yahoo News
c 202-258-2535